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Pro Se Litigant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ROBERT MARTINSON,

Plaintiff,

vs.

CITY OF SACRAMENTO; DANIEL
HAHN, CHIEF OF POLICE; JOE ELLIS,
DETECTIVE POLICE OFFICER; TODD
CULP, DETECTIVE POLICE OFFICER;
and DOES 1-10,

Defendants.

Case No.: 2:21-cv-02130-DAD-JDP

**JOINT STIPULATION TO MODIFY
SCHEDULING ORDER; ~~PROPOSED~~
ORDER**

Complaint filed: November 17, 2021
Complaint served: July 17, 2023

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COMES NOW Plaintiff Robert Martinson and Defendants City of Sacramento, Daniel Hahn, Joe Ellis, and Todd Culp, by and through their respective counsel and subject to the approval of this Court, hereby stipulate and respectfully request that this Court's Initial Pretrial Scheduling Order dated December 19, 2023 (ECF No. 19), be modified to reflect new deadlines and cut-off dates as follows, or as to accommodate the Court's docket:

	<u>Current Date</u>	<u>New Date</u>
Fact Discovery Cut-Off:	March 28, 2025	October 3, 2025
Discovery Motion Cut-Off:	March 6, 2025	September 11, 2025
Expert Disclosure:	January 30, 2025	July 30, 2025
Rebuttal Expert Disclosure:	February 13, 2025	August 31, 2025
Dispositive Motions Hearing Deadline:	May 29, 2025	November 28, 2025

WHEREAS, the parties have had difficulty in coordinating scheduling for discovery;

WHEREAS, evidence directly at issue in this matter is currently under seal in the ongoing, adjacent criminal matter in the Superior Court of Sacramento County (Case No. 19FE010790) and will require unsealing for use by the parties in this matter;

WHEREAS, counsel for the parties have met and conferred and agree that it would be in the interest of justice and judicial economy and that good cause exists for the modification of the scheduling order;

WHEREAS, this stipulation is not being made for the purpose of delay, or any other improper purpose;

WHEREAS, continuing the deadlines will not prejudice any party or their counsel;

WHEREAS, this is the parties' first request to modify the scheduling order; and

WHEREAS, the parties have attempted to contact the Court Clerk to ascertain the availability of the above-listed dates as they pertain to the Court's calendar:

THEREFORE, the parties agree and stipulate to the above-requested modification to this Court's Initial Pretrial Scheduling Order (ECF No. 19), or as to accommodate this Court's docket.

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1 **IT IS SO STIPULATED.**

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3 DATED: March 13, 2025

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5 By: /s/ ROBERT MARTINSON
6 **ROBERT MARTINSON**
7 Pro Se Litigant

8 DATED: March 13, 2025

SUSANA ALCALA WOOD,
City Attorney

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11 By: /s/ KATE D.L. BROSSEAU
12 **KATE D.L. BROSSEAU**
13 Deputy City Attorney

14 Attorneys for the
15 CITY OF SACRAMENTO, DANIEL
16 HAHN, JOE ELLIS, and TODD CULP
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ORDER

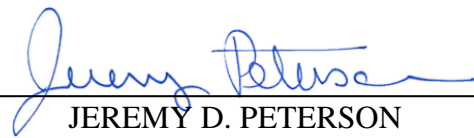
Having reviewed and considered the above stipulation, the scheduling order is modified to reflect the following deadlines:

New Date

Discovery Cut-Off:	October 3, 2025
Discovery Motion Hearing Deadline:	September 11, 2025
Expert Disclosure:	July 30, 2025
Rebuttal Expert Disclosure:	August 13, 2025
Dispositive Motions Hearing Deadline:	December 4, 2025

IT IS SO ORDERED.

Dated: March 18, 2025


JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE